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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

Master File No. M07-1827 SI

MDL No. 1827

This Document Relates to:
ALL DIRECT PURCHASER ACTIONS

**REQUEST FOR INTERNATIONAL
JUDICIAL ASSISTANCE (LETTER
ROGATORY) FOR SERVICE ON MITSUI
& COMPANY (TAIWAN), LIMITED**

To the Appropriate Judicial Authority in Taiwan:

The United States District Court for the Northern District of California presents its compliments to the Appropriate Judicial Authority in Taiwan and respectfully requests international judicial assistance to effect service of process in connection with a civil proceeding currently pending before this Court.

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NATURE AND PURPOSE OF THE PROCEEDING

Plaintiffs brought an antitrust class action on behalf of all persons and entities who directly purchased a Thin Film Transistor-Liquid Crystal Display (“TFT-LCD”) Product in the United States from the named defendants between January 1, 1996 and December 11, 2006. “TFT-LCD Products” are defined to include both TFT-LCD panels as well as products containing TFT-LCD panels.

Plaintiffs allege that, beginning in at least on January 1, 1996, the defendants conspired, combined, and contracted to fix, maintain, and/or stabilize prices for the TFT-LCD Products that were sold in the United States. Plaintiffs allege that as a result of defendants’ conspiracy, plaintiffs paid higher prices for TFT-LCD Products than they would have paid if the conspiracy had not occurred.

Plaintiffs pray that the Court enter judgment on their behalf, and that the Court decree: that this action may proceed as a class action; that defendants violated Section 1 of the Sherman Act, 15 U.S.C. §1; that plaintiffs and members of the Class shall recover damages sustained by them as provided by federal antitrust laws; that defendants shall be permanently enjoined and restrained from continuing the alleged conspiracy; and that plaintiffs shall recover their costs of this suit.

It has been represented to this Court that defendant Mitsui & Co. (Taiwan), Ltd. is a company organized and existing under the laws of Taiwan, with its principal place of business at:

mitsui & co. (taiwan), ltd.

Tunna Tower 21F
No. 97 Tunhua South Rd. Section 2
Taipei City, 106
Taiwan

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ASSISTANCE REQUESTED

This Court respectfully requests that the Taiwanese judicial authorities:

1. Cause one copy of the following document to be served upon Defendant Mitsui & Co. (Taiwan), Ltd. at the above address in the manner prescribed for the service of similar documents under the laws of Taiwan: Summons in a Civil Action; Third Amended Direct Purchaser Plaintiffs' Consolidated Complaint (with Exhibit A); Standing Order for All Judges of the Northern District of California—Contents of Joint Case Management Statement; this Court's Standing Order; this Court's Case Management Conference Order; this Court's Standing Order Re: Cases Designated For Electronic Filing; and the ECF Registration Information Handout.

2. Cause the person who serves the documents upon an officer of Mitsui & Co. (Taiwan), Ltd. to execute an affidavit of service as provided by Taiwanese law;


3. Return through diplomatic channels to Legal Language Services, plaintiffs' international litigation support firm, the affidavit of service and a copy of the documents which were served.

The Courts of the United States are authorized by statute, Section 1696, Title 23, United States Code, to extend similar assistance to the Tribunals of Taiwan in like cases.

This Court extends to the Judicial Authorities of Taiwan the assurances of its highest consideration.

Respectfully Requested,

Dated: December ____, 2009


The Honorable Susan Illston
District Court Judge, Northern District of California
450 Golden Gate Avenue, Courtroom 10, 19th Floor
San Francisco, California 94102
UNITED STATES OF AMERICA
Tel.: 415-522-2028